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Attorneys for Creditor  
Auto Auction of Montana

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

In re:

INCREDIBLE AUTO SALES, LLC,

Debtor.

CASE NO. 06-60855

**APPLICATION FOR ADMINISTRATIVE  
EXPENSES**

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AUTO AUCTION ASSOCIATES OF MONTANA, INC., d/b/a AUTO AUCTION OF MONTANA a/k/a AUTO AUCTION OF BILLINGS ("Auto Auction"), through its counsel, and pursuant to 11 U.S.C. § 503(9) submits this Application for Administrative Expenses.

Auto Auction makes this application on the grounds that it is entitled to an administrative expense for goods received by the debtor within twenty (20) days before the commencement of bankruptcy when the goods were sold to the debtor in the debtor's ordinary course of business. This application is being made for

vehicles which the debtor received and sold without obtaining financing from any lender. This application is being made without waiving the reclamation claims for vehicles which were not sold prior to bankruptcy and Auto Auction reserves the right to assert a right to additional administrative expenses, depending upon the outcome of its reclamation claims.

In particular, Auto Auction requests an administrative expense in the amount of \$32,225.00 for the following vehicles:

Year	Make	Model	VIN	Value
2006	CHEVY	MALIBU	1G1ZT51F46F 115830	\$9,675.00
2005	KIA	OPTIMA	KNAGD126855 426066	\$8,050.00
2005	KIA	RIO	KNADC125356 361327	\$6,450.00
2005	KIA	SPECTRA	KNAFE121755 172069	\$8,050.00

Each of the above vehicles were subject to sales within twenty (20) days of the filing of bankruptcy and were sold by the debtor, presumably to consumers.

DATED this 16<sup>th</sup> day of January, 2007.

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208 North Broadway, Suite 208  
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Billings, MT 59103-0429

By: /S/ Bruce F. Fain  
Bruce F. Fain  
Attorneys for Plaintiff Auto  
Auction of Montana

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NOTICE TO CREDITORS

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If you object to the application, you must file a written responsive pleading and request a hearing within ten (10) days of the date of the motion. The objecting party shall schedule the hearing and shall include in the caption of the responsive pleading the date, time and location of the hearing by inserting in the caption the following:

NOTICE OF HEARING

Date: \_\_\_\_\_  
Time: \_\_\_\_\_  
Location: \_\_\_\_\_

This contested matter shall be scheduled for hearing for the next hearing date scheduled in the division within which the case is filed. The date, time, and location of the hearing can be obtained from the Clerk of Court or from the Court's website at [www.mtb.uscourt.gov](http://www.mtb.uscourt.gov). In the event such scheduled hearing date is thirty (30) days beyond the filing date of the motion for relief, then a preliminary hearing within such thirty (30) day period shall be scheduled by the responding party after such party contacts the Clerk of Court to confirm the preliminary telephone hearing date and time, which shall be set forth in the response.

If you fail to file a written response to the above Motion to Modify Stay with the particularity required by Mont. LBR 4001-1(b), and request a hearing, within ten (10) days of the date of this Notice, with service on the undersigned and all parties entitled to service under all applicable rules, then your failure to respond or to request a hearing will be deemed an admission that the motion for relief should be granted without further notice of hearing.

DATED this 16th day of January, 2007.

Murphy, Kirkpatrick & Fain, P.L.L.P.  
208 North Broadway, Suite 208  
P.O. Box 429  
Billings, MT 59103-0429

By: /S/ Bruce F. Fain  
Bruce F. Fain  
Attorneys for Auto Auction

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 16<sup>th</sup> day of January, 2007, a copy of the APPLICATION FOR ADMINISTRATIVE EXPENSES was served upon counsel of record by the following method:

1-5, 7-19 CM/ECF

6 Mail

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/S/ Bruce F. Fain